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IN THE

Supreme Court of the United States

OCTOBER TERM, 1997

NATIONAL COLLEGIATE ATHLETIC ASSOCIATION,
S. DAVID BERST AND ROBERT L. STROUP, III,
Petitioners,

vs.

JERRY TARKANIAN and LOIS TARKANIAN,
Respondents.

ON PETITION FOR WRIT OF CERTIORARI
TO THE SUPREME COURT OF THE STATE OF NEVADA

BRIEF IN OPPOSITION TO PETITION FOR WRIT OF CERTIORARI

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Respondents Jerry Tarkanian and Lois Tarkanian respectfully request that this Court deny the petition for writ of certiorari, seeking review of the decision of the Supreme Court of Nevada entered on May 22, 1997. That decision is reported at 939 P.2d 1049 (1997).

STATEMENT OF FACTS

On November 30, 1992, Coach Tarkanian and his wife, Lois, filed a complaint against the Petitioners, the National Collegiate Athletic Association, S. David Berst, and Robert L. Stroup, III, in the district court of Clark County, Nevada. Four years after the Tarkanians filed their case against the Petitioners, and two months before trial, the Petitioners filed a motion to transfer venue out of Clark County. The motion was filed pursuant to the Nevada state statute dealing with transfer of venue, Nevada Revised Statutes section 13.050(2)(b). That statute states that the district court may change the place of trial when there is reason to believe that an impartial trial cannot be had therein. In their motion, the Petitioners complained for the first time in four years that they believed they could not receive a fair trial in Clark County. They argued they could not get an impartial jury in Clark County because of publicity about Coach Tarkanian, the NCAA, and UNLV published from 1986 through 1992.

The district court disagreed with the Petitioners. The district court first held that the Petitioners' motion was untimely because it was based upon facts which were known or should have been known to the Petitioners five years prior when the case was first filed. The district court next found that the amount of media attention that the case had received not only greatly diminished since the time the case was filed, but it literally disappeared. It making this finding, the district court noted that the NCAA's own expert

relied predominantly on media reports from 1986 through 1992 which were four years old. Third, the district court found that the explosive growth of Clark County's population brought huge numbers of people into the County during the previous five years who were completely unfamiliar with this case. Last, the district court noted that this was an appropriate case for a questionnaire which could identify any rabid basketball fans who might be prejudiced against one party or the other. The district court therefore denied the Petitioners' motion to transfer venue because it saw no reason to believe an impartial trial could not be had in Clark County. (Petition, Appendix D, App. 18-19). The Petitioners appealed that order.

On appeal, the Supreme Court of the State of Nevada held that the lower court's decision not to transfer venue out of Clark County was not an abuse of discretion.

First, the state supreme court discussed the expert opinions produced by both sides, and apparently agreed with the opinions made by the Tarkanians' expert, Dr. Robert Tortora. The court noted that the Petitioners' expert analyzed news articles that mentioned UNLV basketball, Tarkanian, or the NCAA which were published in 1992 and earlier, four years prior to the trial date. The court also noted that even though the Petitioners' expert found an additional five hundred articles published between January 1993 and April 1996 that referred to Tarkanian, that expert did not analyze those articles for content. (Petition, Appendix A, App. 5).

The supreme court then discussed the opinion of the Tarkanians' expert, Dr. Tortora. Dr. Tortora is one of the most distinguished statisticians in the world. He is the chief

methodologist of the Gallup Organization. Before joining Gallup, he worked for over twenty years in the Federal Statistical System as a mathematical statistician. Dr. Tortora served in many technical and management positions associated with all aspects of survey design, execution, and research. During his last three years at the United States Census Bureau, he was the Associated Director for Statistical Design, Methodology, and Standards, and had overall methodological responsibility for all the surveys and censuses conducted by the United States Census Bureau. In particular, he led the research program for the largest statistical undertaking in the U.S. -- the year 2000 Census of Population and Housing.

The Nevada Supreme Court recognized the fact that Dr. Tortora criticized the analysis made by Petitioners' experts. Dr. Tortora found that the link between the content of the articles cited by the Petitioners' experts and general attitudes about the target population were unclear. The court also mentioned Dr. Tortora's opinion that there were design flaws in the survey conducted by Petitioners' experts, including the failure to implement procedures to eliminate nonresponse bias. The supreme court reiterated Dr. Tortora's conclusion that "there is no evidence to link the trends in the newspaper articles with the attitudes, opinion, and beliefs of those in [the experts'] survey." (Petition, Appendix A, App. 5).

Second, the state supreme court found that the population of Las Vegas had grown from 858,232 in 1992, the year that the Tarkanians filed their complaint, to 1,028,228 in 1995. The court concluded that a large proportion of the potential jury pool was not exposed to the articles analyzed by the Petitioners' experts. (Petition, Appendix A, App. 5).

Third, the supreme court noted that with scant few exceptions, the newspaper quotations the Petitioners characterized as inflammatory were published several years before the May 1996 trial date. The court found that the Petitioners failed to show that the Clark County jury pool was likely to have read those statements or shared in their sentiments. (Petition, Appendix A, App. 5).

The Nevada Supreme Court concluded that the substantial evidence in the record supported the trial court's ruling not to transfer venue from Clark County. The court held that the trial court did not manifestly abuse its discretion in denying the Petitioners' motion for change of venue. (Petition, Appendix A, App. 6).

REASONS WHY THE PETITION SHOULD BE DENIED

I. The First Question Presented In The Petition Was Neither Raised Before, Nor Decided By, The Supreme Court of Nevada.

Petitioners' first question presented is whether a defendant in a civil case has a fundamental due process right to an impartial factfinder. The Supreme Court of Nevada never decided this issue. In fact, the Petitioners never raised this as an issue to be decided by the Nevada state courts. Therefore, as discussed below, this Court does not have the jurisdiction to hear this issue.

Section 1257(a) of Title 28 of the United States Code sets forth the law regarding the United States Supreme

Court's certiorari jurisdiction over state court decisions. That section provides:

> Final judgments or decrees rendered by the highest court of a State in which a decision could be had, may be reviewed by the Supreme Court by writ of certiorari where the validity of a treaty or statute of the United States is drawn in question or where the validity of a statute of any State is drawn in question on the ground of its being repugnant to the Constitution, treaties, or laws of the United States, or where any title, right, privilege, or immunity is specially set up or claimed under the Constitution or the treaties or statutes of, or any commission held or authority exercised under, the United States.

28 U.S.C. § 1257(a). Thus, this Court has no jurisdiction to review a state judgment, except where a federal question is involved.

The Supreme Court stated:

> It is well settled that this Court will not review a final judgment of a state court unless "the record as a whole shows either expressly or by clear implication that the federal claim was adequately presented in the state system." . . . When "the highest state court has failed to pass upon a federal question, it will be assumed that the omission was due to want of proper presentation in the

> state courts, unless the aggrieved party in this Court can affirmatively show the contrary."

Board of Directors of Rotary Int'l v. Rotary Club of Duarte, 481 U.S. 538, 550 (1987); *see also Exxon Corp. v. Eagerton*, 462 U.S. 176, 180-81 n.3, 103 S. Ct. 2296, 2300-01 n.3 (1983).

In this case, the Nevada Supreme Court did not reach any decision regarding "the fundamental due process rights of a civil defendant to an impartial factfinder." (Petition, Appendix A). Instead, the state supreme court decided that the trial court did not abuse its discretion in finding that the Petitioners could get a fair trial in Clark County. Nowhere in the decision did the state court mention the "United States Constitution" or "due process rights." Because the Nevada Supreme Court did not decide the issue of whether a defendant has certain due process rights, this Court has no jurisdiction to hear that issue now.

The Petitioners did state in their brief to the Nevada Supreme Court a general rule that a fair trial is a basic requirement of due process. However, that was not an issue that the Petitioners asked the Nevada Supreme Court to decide. Instead, the only issue before that court was whether the trial court errored in refusing to transfer venue out of Clark County. In conclusion, this Court has no jurisdiction to hear the first question presented because it was not raised before, nor decided by, the state court.

II. The Second Question Presented Was Decided By The Nevada Supreme Court On Independent And Adequate State Grounds.

Petitioners argue that this Court should review the Nevada Supreme Court decision denying their motion to change venue on the ground that there is a split of authority in the state and lower federal courts regarding the appropriate level of appellate review for a venue order. Petitioners completely ignore the fact that the Nevada Supreme Court decided this issue on independent and adequate state grounds, thus barring review by this Court.

The United States Supreme Court should not consider state decisions which are based upon independent and adequate state grounds:

> This Court from the time of its foundation has adhered to the principle that it will not review judgments of state courts that rest on adequate and independent state grounds (citations omitted). The reason is so obvious that it has rarely been thought to warrant statement. It is found in the partitioning of power between the state and federal judicial systems and in the limitations of our own jurisdiction. *Our only power over state judgments is to correct them to the extent they incorrectly adjudge federal rights.* And our power is to correct wrong judgments, not to revise opinions. We are not permitted to render an advisory opinion, and if the same judgment would be rendered by the state court after we corrected its views of federal

> laws, our review could amount to nothing more than an advisory opinion.

Herb v. Pitcairn, 324 U.S. 117, 125-26, 65 S. Ct. 459, 463 (1945) (emphasis added).

In Nevada, a trial court has the discretion to grant or deny a motion to change venue under Nevada Revised Statute section 13.050. Specifically, section 13.050 states, "The court may, on motion, change the place of trial . . . . (b) when there is reason to believe that an impartial trial cannot be had therein." Nev. Rev. Stat. § 13.050(2)(b).

In this case, the Nevada Supreme Court reiterated its state law that an order denying a venue change is reviewed for a manifest abuse of discretion. Specifically, the Nevada Supreme Court held, "This court reviews a trial court's order denying a motion to change venue for a manifest abuse of discretion. *Fabbi v. First Nat'l Bank*, 62 Nev. 405, 414, 153 P.2d 122, 125 (1944), cited in *Pearce v. Boberg*, 87 Nev. 225, 256, 485 P.2d 101, 101 (1971)." (Petition, Appendix A, App. 4). Thus, the Nevada state court never adjudged any federal law when it simply repeated this state standard of review.

In conclusion, the state decision regarding the standard of review was based upon independent and adequate state grounds, and therefore this Court lacks jurisdiction to review that decision.

III. The Second Question Presented Does Not Invoke a Substantial Federal Question.

The Petitioners claim in their second question presented that this Court has jurisdiction to hear the issue of whether the Nevada Supreme Court used the appropriate standard of review in reviewing a lower court's venue order. As discussed below, this Court does not have the authority to hear this issue because it is not a federal question.

This Court only has jurisdiction to hear decisions by state courts which raise federal questions:

> Crucial to the exercise of our certiorari jurisdiction is whether the controlling issue in the state court case is a federal issue, that is, an issue arising under the United States Constitution or under federal laws or treatises. But the fact that a federal question lurks in the case doesn't mean, standing alone, that a state decision will be reviewed. . . . [T]he federal question must be a substantial question.

Justice Brennan, *State Court Decision and the Supreme Court*, 31 Penn. Bar Ass'n Q. 393, 399-400 (1960).

In this case, the Nevada state court reiterated the standard of review in venue transfer cases. (Petition, Appendix A, App. 4). In doing so, the court was only setting forth the state standard of review for a state issue. This decision by the state court was not a "controlling" issue "arising out of the United States Constitution or under the federal law or treatises." A federal law may now be

"lurking" around this case only because Petitioners have tried to interject that argument for the sole purpose establishing jurisdiction by this Court. However, this was not a federal question before the state court, and it is not one now.

In conclusion, the second question does not involve a substantial federal question. This Court, therefore, does not have jurisdiction to hear the issue.

IV. Even If It Did Make An Independent Review Of The Facts,[1] This Court Would Find That Venue Should Not Be Transferred.

A. Any Publicity Relating To This Case Not Only Has Greatly Diminished, It Has Disappeared.

The Petitioners claim that there has been two decades of "torrential and inflammatory" pretrial publicity against the Petitioners and about this case which will prevent the Petitioners from receiving a fair trial in Clark County.

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[1] In their third question presented, the Petitioners ask this Court to revise the factual and legal conclusions of the Nevada trial and supreme courts. The United States Supreme Court generally will not re-examine a state court's findings and conclusions of fact, unless there are exceptional circumstances that would justify the Court's rejecting the state court's findings. *See, e.g., Lloyd A. Fry Roofing Co. v. Wood, 344 U.S. 157, 160, 73 S. Ct. 204, 206 (1953)* (Court refusing to set aside factual findings of state supreme court that leases where shams because the findings were not without factual foundation). In this case, there is ample factual foundation to support the state courts' decisions, and for that reason alone, this Court should not revise these factual conclusions.

However, the facts show that any publicity regarding this suit has not only diminished, it has literally disappeared.

The studies performed by Petitioners' experts relating to publicity in this case was limited to articles published between the years 1986 and 1992. In the Petitioners' original motion to change venue, their expert, Dr. Steven Penrod, admitted that he analyzed articles published from 1986 through 1992 only. In other words, no analysis was made of articles published for the four year period of time before the trial date of May 28, 1996.

Furthermore, Dr. Penrod never produced the articles which he claimed he analyzed. Therefore, it is impossible to determine whether all of the articles used by Dr. Penrod dealt with this litigation, let alone contained inflammatory comments which would have prejudiced the Petitioners. After all, the only thing that the Petitioners have admitted is that the articles mentioned "Tarkanian, UNLV basketball, or the NCAA." For all the Tarkanians know, the so-called pervasive publicity which the Petitioners' claim they were damaged by could relate to anything from UNLV basketball scores, to Coach Tarkanian's health, to the NCAA's national basketball tournament. Therefore, it is doubtful that there was "pervasive, inflammatory media reports" about the Petitioners from 1986 through 1992.

Moreover, a good number of the reports cited by the Petitioners do not even deal with them. For example, in their brief before the Nevada Supreme Court, the Petitioners argue that "recent newspaper editorials have even stated that the NCAA will 'never be forgiven' because it 'robbed' the Las Vegas community of the 'good fellowship and togetherness that supporting the [UNLV] Rebels brought.'"

(emphasis added). However, The article does not accuse the NCAA of somehow robbing the Las Vegas community. In fact, the NCAA is not even mentioned in the article. This is just one example of how the Petitioners improperly extrapolate from these news articles in claiming that they are the target of inflammatory comments.

Additionally, the Petitioners have no evidence that there existed pervasive inflammatory reports about the Petitioners after 1992. In fact, Dr. Penrod admitted that his media analysis was limited to the years 1986 through 1992, and not beyond those years. Specifically, Dr. Penrod stated that "that time frame was selected because it covers the primary years in which the alleged tortious acts took place -- the plaintiffs would no doubt challenge subsequent coverage as being largely irrelevant to the issues in dispute." Therefore, the Petitioners' own expert tacitly admits that any media reports published after 1992 really had nothing to do with the issues in this case, and therefore, were irrelevant to the issues in dispute. If there had been a deluge of Las Vegas articles relating to this case, Dr. Penrod certainly would have included them in his analysis to show that prejudicial publicity against the Petitioners continued until the trial date.

Dr. Penrod did state in his affidavit that he performed a Westlaw database search of the *Las Vegas Review Journal* by typing in the search, "Jerry /3 Tarkanian." He came up with 500 articles. However, Dr. Penrod did not determine whether those articles discussed the NCAA, and did not conduct any content analysis of those articles. Therefore, those articles could be completely unrelated to the Petitioners and the issues in this case.

The Petitioners did attach to their motion before the district court articles published from 1993 through 1996 which they claimed were so inflammatory and pervasive that current publicity prevented the Petitioners from getting a fair trial in Las Vegas. The articles from 1993 to 1996 totalled twenty-six -- an average of six articles a year. This publicity can hardly be called pervasive.

Moreover, the far majority of the articles which the Petitioners produced as the only evidence of highly prejudicial publicity do not even mention or involve the Petitioners. Out of the twenty-six articles which the Petitioners claim relate to this venue issue, twenty-one do not even mention the Petitioners, or only mention the Petitioners in passing. These twenty-one articles do not contain any information relating to the issues of this case or any inflammatory or highly prejudicial statements about the Petitioners. The remaining five articles published in 1993 and 1994 can hardly be classified as pervasive and highly prejudicial publicity. Therefore, the Petitioners in no way can argue that highly inflammatory statements about Petitioners have been published in numerous articles up until the trial date.

B. The Explosive Growth Of Clark County's Population Brought Huge Numbers Of People Into The County During The Past Five Years Who Are Completely Unfamiliar With This Case.

Before, during, and after the filing of the case, the population of Clark County increased dramatically. In 1986, the population in Clark County was 605,346. By the time the Tarkanians filed their complaint in 1992, the

population had exploded to 858,232. The population continued to grow in dramatic leaps into the year 1995 when the census topped 1,028,228. The population is still growing today. In analyzing these numbers, almost one-half of the population living in Las Vegas today was not even in the County ten years ago.

Dr. Penrod, the Petitioners' publicity expert, claims that the years 1986 through 1992 were the primary years in which the NCAA's alleged tortious acts against the Tarkanians took place. The population of Clark County grew from 605,346 in 1986, to 858,232 in 1992, during the time period the Petitioners say the relevant articles were published. Dr. Penrod tacitly admits that any news articles after 1992 are largely irrelevant to the issues in this case. Afterall, he would have analyzed any articles published up to the time of trial if those articles had been relevant to the case.

After the publication of the articles which the Petitioners claim are so damaging to them, the population in the county grew to 1,028,228. Therefore, the explosive growth of Clark County's population has brought huge numbers of people into the County within the past five years who are completely unfamiliar with the publicity published years ago of which the Petitioners are so concerned.

C. According To The Chief Methodologist For The Gallup Organization, The Petitioners' Expert Reports Do Not Measure The Opinions, Beliefs, Or Attitudes Of Jury Pools From Clark And Washoe Counties.

According to Dr. Robert Tortora, the chief methodologist for the foremost survey organization in the world, the reports prepared by the Petitioners' experts do not accurately reflect the opinions, beliefs, or attitudes about the Petitioners or the Tarkanians held by potential jury pools from Clark and Washoe County.

Dr. Tortora conducted an exhaustive analysis of the survey prepared by Dr. Kent Tedin, one of the Petitioners' experts. Dr. Tortora concluded that the methodology of the Tedin survey -- the manner in which the survey was designed and the method of gathering the data -- is fraught with errors. The totality of design flaws, such as not weighing by the number of residential telephone numbers, the failure to collect demographic characteristics for reducing nonresponse bias, the failure to address such a pertinent and necessary issue as the nonresponse rate in the survey, and the absence of procedures to reduce potential nonresponse bias, indicate serious quality problems in the survey.

Further, in Dr. Tortora's expert opinion, the questions posed in the Tedin survey by their very nature cannot accurately reflect the opinions, beliefs, and attitudes of potential jury pools from Clark and Washoe Counties. Dr. Tortora stated that one can only conclude from the survey that the results represent the 400 respondents in each county. In other words, the survey reflects only what those

interviewed said. The survey is not an accurate estimate of the opinions, beliefs, or attitudes of the target populations in Clark and Washoe Counties.

Dr. Tortora believes that the report of the Petitioners' other expert, Dr. Penrod, is similarly flawed for several reasons. First, Dr. Tortora's finding that the Tedin report is fatally flawed renders the Penrod Report of content analysis utterly irrelevant. Dr. Penrod admits that his analysis is inextricably linked to the accuracy of the Tedin Report. Because the Tedin Report does not accurately reflect the opinions, beliefs, and attitudes of potential jury pools about the Petitioners and the Tarkanians, the Penrod Report which relies on the Tedin Report cannot reflect those opinions, beliefs, and attitudes. Second, assuming for the moment that credence is to be given to content analysis, Dr. Tortora criticizes the fact that the Petitioners' expert failed to examine national print and other local media outlets. Third, Dr. Tortora concludes that there is no evidence to link the trends in the newspaper articles examined in the Penrod Report with the attitudes, opinions, and beliefs with those in the Tedin Report.

According to Dr. Tortora, the only way public opinion may potentially be measured is through a sound survey. The Petitioners' reports fail to do this.

In conclusion, even if this Court were to make an independent review of the facts, it would agree with the Nevada district court and the Nevada Supreme Court that venue cannot be transferred from Clark County.

CONCLUSION

For these reasons, the petition for a writ of certiorari should be denied.

Respectfully submitted,

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